

**UNITED STATES DISTRICT COURT
IN AND FOR DISTRICT OF DELAWARE**

GRAPHIC ARTS MUTUAL INSURANCE
COMPANY

Plaintiff,

V.

INDIAN RIVER SCHOOL DISTRICT, *et al.*

Defendants.

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Civil Action No. 06-246-JJF

JOINT MOTION TO EXTEND DEADLINES

Plaintiff Graphic Arts Mutual Insurance Company (“Graphic Arts”) and Defendants Indian River School District, Indian River School Board, Harvey L. Walls, Mark A. Isaacs, John M. Evans, Richard H. Cohee, Gregory A. Hastings, Nina Lou Bunting, Charles M. Bireley, Donald G. Hatier, Reginald L. Helms, M. Elaine McCabe, Lois M. Hobbs, and Earl J. Savage (collectively “IRSB”), by counsel, move this Court to enter the attached order, pursuant to Paragraph 4(g) of the Rule 16 Scheduling Order.

Graphic Arts filed this action to, *inter alia*, determine its rights and obligations under the insurance contract for the *Dobrich* Action. IRSD filed a counter-claim alleging breaches and anticipatory breaches of the insurance contract. Graphic Arts and IRSD now request, by this Motion, an extension of the currently pending deadlines. The proposed extension will not alter the currently pending October 4, 2007 Pre-trial Conference.

Specifically, the parties request an extension of the deadlines for producing expert reports, amendment of pleadings, and dispositive motions as follows:

- Reports from retained experts required by Fed. R. Civ. P. 26(a)(2) are due from the plaintiff(s) by July 23, 2007; from the defendant(s) by August 6, 2007;
 - All motions to amend the pleadings shall be filed on or before August 24, 2007;
 - Any case dispositive motions, pursuant to the Federal Rules of Civil Procedure, shall be served and filed with an opening brief on or before September 4, 2007.
- Briefing shall be pursuant to D. Del. LR 7.1.2

As of the filing of this motion, the parties have exchanged initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1) and have exchanged written discovery requests and responses pursuant to Federal Rules of Civil Procedure 33 and 34, but have not yet engaged in depositions and additional discovery. The parties are currently working on the scheduling of various depositions.

WHEREFORE, Graphic Arts and IRSB respectfully request that this Court enter the attached Order.

Respectfully submitted,

/s/ Warren Pratt
Warren Pratt (Del. Bar No. 4334)
DRINKER BIDDLE & REATH LLP
1100 N. Market Street
Suite 1000
Wilmington, DE 19801
Telephone: (302) 467-4200
Facsimile: (302) 467-4201

/s/ Timothy Jay Houseal
Anthony G. Flynn (Del. Bar No. 74)
Timothy Jay Houseal (Del. Bar No. 2880)
YOUNG, CONAWAY, STARGATT &
TAYLOR, LLP
The Brandywine Building
1000 West Street, 17th Floor
Wilmington, DE 19801
Telephone: (302) 571-6682
Facsimile: (302) 576-3300

Jason P. Gosselin (*pro hac vice*)
DRINKER BIDDLE & REATH LLP
One Logan Square
18th & Cherry Streets
Philadelphia, Pennsylvania 19103
Telephone: (215) 988-3371
Facsimile: (215) 988-2757

Attorneys for the Defendants

Edward J. Grass (*pro hac vice*)
Steven W. McNutt (*pro hac vice*)
HUNTON & WILLIAMS LLP
1751 Pinnacle Drive, Suite 1700
McLean, Virginia 22102
Telephone: (703) 714-7400
Facsimile: (703) 918-4050

*Attorneys for Graphic Arts Mutual
Insurance Company*

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STIPULATED ORDER

And now, on this ____ day of June, 2007, upon consideration of the parties joint request, it is hereby ORDERED and DECREED as follows:

- Reports from retained experts required by Fed. R. Civ. P. 26(a)(2) are due from the plaintiff(s) by July 23, 2007; from the defendant(s) by August 6, 2007;
- All motions to amend the pleadings shall be filed on or before August 24, 2007;
- Any case dispositive motions, pursuant to the Federal Rules of Civil Procedure, shall be served and filed with an opening brief on or before September 4, 2007.

Briefing shall be pursuant to D. Del. LR 7.1.2

Judge Joseph J. Farnan, Jr.